

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(consolidated cases)

**DISTRICT ATTORNEY OGG'S OBJECTIONS TO
UNITED STATES' CORRECTED EXHIBIT LIST**

#	Exhibit	Corrected Bates Range	Date Identified	Objections
1	SB 1 Enrolled	US00007838- US00007913	7/28/23	
2	Criminal Justice Impact Statement: HB 3 (87th Legislature, 1st Called Session) (2021)	TXLEG_0000028	7/28/23	
3	County and District Clerk's Association: Election Officials' Concerns with HB 3 (2021)	STATE035238	7/28/23	
4	Texas Association of Elections Administrators: Comments on SB 7 (2021)	TXLEG_0000046- TXLEG_0000048	7/28/23	
5	Fiscal Note: SB 1 (87th Legislature, 2d Called Session) (2021)	TXLEG_0000071- TXLEG_0000072	7/28/23	
6	SB 1599 Enrolled	STATE182732- STATE182743	7/28/23	
7	HB 357 Enrolled	STATE182637- STATE182640	7/28/23	
8	HB 357 Introduced	STATE182642	7/28/23	
9	SB 975 Introduced	US00007914- US00007915	7/28/23	
10	Revised Civil Statutes of the State of Texas art. 2956 (1925)	US00008026- US00008032	7/28/23	

101	Election Advisory No. 2022-08 (Jan. 28, 2022)	STATE019849- STATE019876	7/28/23	
102	Election Advisory No. 2022-12 (Feb. 11, 2022)	STATE001469- STATE001473	7/28/23	
103	Election Advisory No. 2022-18 (Apr. 26, 2022)	STATE087989- STATE087992	7/28/23	
104	Federal Voting Assistance Program: 2022-23 Voting Assistance Guide: Texas (Jan. 2022)	STATE115176- STATE115191	7/28/23	
105	Texas Office of the Attorney General Opinion No. KP-0411 (Aug. 17, 2022)	US00008000- US00008006	7/28/23	
106	LWV of Texas, Tips for Voters - New Election Laws (Dec. 2, 2021)	STATE046118	7/28/23	FRE 801 et seq.
107*	HB 2512 Process (June 16, 2016)	STATE072497- STATE072499	7/28/23	
108*	HB 2512 Process (June 21, 2016)	STATE088963- STATE088967	7/28/23	
109*	SSN Update Counts Spreadsheet (2016)	STATE072509	7/28/23	
110	Shared All County Workbook, Sheet: All County List (Jan. 2021)	STATE053246	7/28/23	
111	List of VR Team Duties (Feb. 19, 2021)	STATE066242- STATE066244	7/28/23	
112	Purchase Order for SB 1 TEAM Updates (Oct. 4, 2021)	STATE180779- STATE180781	7/28/23	
113	SB 1 Technical Specifications (TEAM System) (Oct. 10, 2021)	STATE052309- STATE052310	7/28/23	
114	SB 1 Requirements (Oct. 10, 2021)	STATE070228	7/28/23	
115	RFP for Voter Education and Outreach Opportunities for 2022 Elections	STATE137757- STATE137837	7/28/23	
116	SOS 2022 Democratic Primary Ballots Accepted/Rejected by County	STATE087300- STATE087305	7/28/23	
117	SOS 2022 Republican Primary Ballots Accepted/Rejected by County	STATE087306- STATE087311	7/28/23	
118	SOS 2022 Constitutional Amendment Election Ballots Accepted/Rejected by County	STATE110691	7/28/23	
119	SOS 2022 March and May Elections Ballots Accepted/Rejected by County	STATE110692	7/28/23	

139	Election Assistance Commission, A Guide to the Election Administration and Voting Survey (July 20, 2022)	US00006751-US00006765	7/28/23	FRE 801 et seq.
140	Election Assistance Commission, Election Administration and Voting Survey 2022 Comprehensive Report (2023)	US00006829-US00006835	7/28/23	FRE 801 et seq.
141	Election Assistance Commission, Election Administration and Voting Survey 2020 Comprehensive Report (2021)	US00006823-US00006828	7/28/23	FRE 801 et seq.
142	Election Assistance Commission, Election Administration and Voting Survey 2018 Comprehensive Report (2019) (excerpt)	US00006819-US00006822	7/28/23	FRE 801 et seq.
143	Election Assistance Commission, Election Administration and Voting Survey 2016 Comprehensive Report (2017) (excerpt)	US00006815-US00006818	7/28/23	FRE 801 et seq.
144	Report of Dr. Eitan Hersh (Feb. 28, 2022)	US00007327-US00007376	7/28/23	FRE 702, 801 et seq.
145	Supplemental Report of Dr. Eitan Hersh (May 4, 2022)	US00007411-US00007442	7/28/23	FRE 702, 801 et seq.
146	Second Supplemental Report of Dr. Eitan Hersh (Feb. 3, 2023)	US00007385-US00007410	7/28/23	FRE 702, 801 et seq.
147	Addendum to Second Supplemental Report of Dr. Eitan Hersh (May 8, 2023)	US00007377-US00007384	7/28/23	FRE 702, 801 et seq.
148	Report of Tammy Patrick (Feb. 28, 2022)	US00007682-US00007703	7/28/23	FRE 702, 801 et seq.
149	Supplemental Report of Tammy Patrick (Apr. 29, 2022)	US00007711-US00007717	7/28/23	FRE 702, 801 et seq.
150	General Election Supplemental Report of Tammy Patrick (Feb. 10, 2023)	US00007704-US00007710	7/28/23	FRE 702, 801 et seq.
151	Report of Dr. Douglas L. Kruse (Corrected) (Feb. 28, 2022)	US00007718-US00007795	7/28/23	FRE 702, 801 et seq.
152	Third Supplemental Report of Dr. Dan Smith (June 7, 2023)	US00007916-US00007985	7/28/23	FRE 702, 801 et seq.
153	State Defendants' Objections and Responses to the United States' First Set of RFAs	US00007804-US00007811	7/28/23	
154	State Defendants' Objections and Responses to the United States' Amendments to First Set of RFAs	US00006672-US00006674	7/28/23	
155	State Defendants' Objections and Responses to the United States' First Set of Interrogatories	US00006661-US00006671	7/28/23	

309	Email from Colleen Oehlschlager (Voter) to Andre Montgomery (SOS) (Nov. 3, 2022)	STATE118514- STATE118517	7/28/23	FRE 801 et seq.
310	Email from Jeanie Longoria (Medina County) to SOS Elections re: Questions re Carrier Envelope (Nov. 3, 2022)	STATE141086	7/28/23	FRE 801 et seq.
311	Email from Andrew Montgomery (SOS) to Jason Hull (Voter) re: Tarrant County Ballot Board There is an Error Regarding Your ID for your Electronic Ballot (Nov. 4, 2022)	STATE118032- STATE118035	7/28/23	
312	Email from William Keene (Voter Parent) to SOS Elections re: Official Election Signature Sheet for an FPCA Voter Form (Nov. 4, 2022)	STATE133670	7/28/23	FRE 801 et seq.
313	Email from SOS Elections to Grace Hoskins (Voter) re: Mail-In Ballot Issue (Nov. 8, 2022)	STATE122573- STATE122574	7/28/23	
314	Email from SOS Elections to Marvin Byers (Voter) (Nov. 8, 2022)	STATE126783	7/28/23	
315	Email from Jennifer Etheridge (Voter) to SOS Elections re: Please Count My Ballot (Nov. 8, 2022)	STATE118344- STATE118346	7/28/23	FRE 801 et seq.
316	Email from Colleen Stadnick (Voter) to SOS Elections (Nov. 10, 2022)	STATE122690- STATE122691	7/28/23	FRE 801 et seq.
317	Election Complaint from John Herbster (Voter) (Nov. 15, 2022)	STATE171804- STATE171810	7/28/23	FRE 801 et seq.
318	Email from Keith Ingram (SOS) to Kate Fisher (SOS) re: 2020 Election Administration and Voting Survey (Nov. 16, 2022)	STATE180236- STATE180237	7/28/23	
319	Email from Lena Proft (SOS) to Jana Onyon (Ellis County) re: Section 31.093 Duty to Contract (Mar. 3, 2023)	STATE177150- STATE177152	7/28/23	
320	Eric Alvarez, <i>Denton County Election Officials Share How to Protect Your Mail-In Vote</i> , WFAA (Aug. 21, 2020)	US00006743- US00006744	7/28/23	FRE 801 et seq.
321	Eline de Bruijn and Jason Whitely, <i>Carrollton Mayoral Candidate Arrested After Police Find Forged Mail-in Ballots</i> , WFAA (Oct. 8, 2020)	US00006706- US00006710	7/28/23	FRE 801 et seq.
322	Press Release, Office of the Texas Secretary of State, Secretary Hughs Commends Texas Voters Following November 3rd General Election (Nov. 30, 2020)	STATE087633	7/28/23	FRE 801 et seq.
323	Zaira Perez, <i>Former Carrollton Mayoral Candidate Indicted on 109 Felony Voter Fraud Charges</i> , Denton Record-Chronicle (May 7, 2021)	US00006840- US00006842	7/28/23	FRE 801 et seq.

324	Taisha Walker, <i>I've Never Missed a Vote: 95-Year Old World War II Veteran Says His Mail-In Ballot Application Has Been Denied Twice Due to New Requirements</i> , Click2Houston (Jan. 25, 2022)	US00006711- US00006712	7/28/23	FRE 801 et seq.
325	Press Release, Office of the Texas Secretary of State, Secretary Scott Encourages Eligible Texans to Vote Early, Make a Plan to Cast a Ballot for the March 1 Primary Election (Feb. 7, 2022)	STATE020224- STATE020229	7/28/23	FRE 801 et seq.
326	Steve Clark, <i>Voting Changes: Garza Says to Read Ballots Carefully</i> , Brownsville Herald (Feb. 10, 2022)	US00008022- US00008024	7/28/23	FRE 801 et seq.
327	Press Release, Cameron County Department of Elections, Cameron County Initiates Cure Process for Returned Ballots by Mail (Feb. 18, 2022)	US00007796	7/28/23	FRE 801 et seq.
328	Garrett Brnger, <i>More Than 1,900 Bexar County Mail Ballots Rejected, Follow New Voting Law Requirement</i> , KSAT (Mar. 8, 2022)	US00007464- US00007466	7/28/23	FRE 801 et seq.
329	Press Release, Harris County Elections Administrator, 89% of Mail Ballots Flagged Under New Law Rejected (Mar. 11, 2022)	Longoria_005179	7/28/23	FRE 801 et seq.
330	Andrew Schneider, <i>19% of Harris County Mail-In Ballots in the 2022 Primary Were Rejected Due to SB 1, According to the Elections Administrator</i> , Houston Public Media (Mar. 11, 2022)	US00006646- US00006648	7/28/23	FRE 801 et seq.
331	Garrett Brnger, <i>Bexar County Elections Officials Try to Prevent Another "Tsunami" of Mail Ballot Rejections</i> , KSAT (Apr. 25, 2022)	US00007454- US00007457	7/28/23	FRE 801 et seq.
332	Press Release, Office of the Texas Secretary of State, Secretary Scott Encourages Texans to Vote Early in May 24 Primary Runoff Elections (May 13, 2022)	STATE134505- STATE134508	7/28/23	FRE 801 et seq.
333	Christian Aleman, <i>Mail-In Ballot Rejections Decreased in Texas in the May Elections</i> , KVUE (July 8, 2022)	US00007458- US00007462	7/28/23	FRE 801 et seq.
334	Press Release, Office of the Texas Secretary of State, Secretary Scott Marks National Voter Registration Day, Highlights Statewide "VoteReady" Voter Education Campaign (Sept. 20, 2022)	STATE120634- STATE120641	7/28/23	FRE 801 et seq.
335	Press Release, Office of the Texas Secretary of State, SOS 101: Voting by Mail in Texas (Oct. 12, 2022)	STATE119692- STATE119698	7/28/23	FRE 801 et seq.
336	Ashley Lopez, <i>Texas Officials Say They're Rejecting Fewer Mail Ballots Than the Primary's Big Spike</i> , Texas Public Radio (Nov. 4, 2022)	US00008007- US00008009	7/28/23	FRE 801 et seq.